

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-
Form Complaint and:

Robert Massey, et al. v. National Football
League, et al.

Court File No. 2:12-cv-6069-AB

**MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL
FOR PLAINTIFFS TITUS DIXON
AND MELINDA CLARK**

Charles S. Zimmerman, J. Gordon Rudd, Jr., and Brian C. Gudmundson of Zimmerman Reed LLP ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Titus Dixon and Melinda Clark only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Robert Massey, et al. v. National Football League, et al.*, No. 2:12-cv-6069-AB, in the Eastern District of Pennsylvania on September 27, 2012, for the benefit of several retired National Football League players, including Titus Dixon and Melinda Clark.

2. Plaintiffs' counsel filed a short form complaint for Titus Dixon and Melinda Clark on October 29, 2012.

3. Since then, irreconcilable differences have arisen between Plaintiffs Titus Dixon and Melinda Clark and the undersigned.

4. Plaintiffs' counsel properly notified Titus Dixon and Melinda Clark of counsel's intention to withdraw from representing them in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Titus Dixon and Melinda Clark only in Court File No. 2:12-cv-6069-AB.

Dated: November 17, 2016

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Charles S. Zimmerman

Charles S. Zimmerman (#120054)

J. Gordon Rudd, Jr. (#222082)

Brian C. Gudmundson (#336695)

1100 IDS Center, 80 South 8th Street
Minneapolis, MN 55402

Telephone: (612) 341-0400

Facsimile: (612) 341-0844

Charles.Zimmerman@zimmreed.com

Gordon.Rudd@zimmreed.com

Brian.Gudmundson@zimmreed.com